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July 15, 1993

93-RF-8585

Richard J. Schassburger Environmental Restoration Division DOE, RFO



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COLORADO DEPARTMENT OF HEALTH (CDH) COMMENTS ON APPENDIX 'E' TO THE QUALITY ASSURANCE ADDENDUM (QAA) TO THE IM/IRA FOR THE SOLAR EVAPORATION PONDS - RLB-348-92

Ref: G. W. Baughman Itr to R. J. Schassburger, Same Subject, June 24, 1993

The referenced letter communicated Colorado Department of Health (CDH) comments regarding Appendix E of the Quality Assurance Addendum (QAA) to the IM/IRA for the Solar Evaporation Ponds. The CDH comments have been addressed, as indicated below, in Revision 0 of the QAA which was approved on May 20, 1993. A copy is in distribution to DOE for forwarding to the CDH.

- 1) An Acronyms and Abbreviations list is included in Rev. 0.
- 2) Section 6.3.2.8 addresses Air Quality Control. To allow timely start-up of Building 910 (B910), the CDH supported the present approach to operations (ie, limiting evaporator operations to approximately 110 days per year in lieu of obtaining a Prevention of Significant Deterioration (PSD) permit). However, the CDH commented that the 110-day limitation is not sanctioned under the IM/IRA Decision Document and that steps must, therefore, be taken to ensure that B910 can operate on a year-round basis.

Air-emissions measurements were taken on the B910 engines during actual operating load, as required by the CDH. The final report on those emissions is being prepared by EG&G Environmental Protection; but preliminary interpretation of the results indicates that emissions will be the limiting factor on the facility operation and that therefore there will be no substantial change from the initial permit level of 110 days. While the IM/IRA does not address the air permit limitation, the objective of the IM/IRA will be met within that limitation. It is not clear that EG&G has any obligation to the CDH to increase the operating capacity of B910 beyond that needed to process Solar Ponds water.

However, the CDH observation that the facility may be appropriate for other uses parallels EG&G's estimation. Waste Operations is considering, for example, B910's potential to treat other streams, eg, laundry water. EG&G will evaluate options for increasing the number of operating days as part of any future proposal to expand the use of B910.

- R. M. Garren, EG&G Air Quality, will coordinate with J. Dion, DOE RFO/EMB, to complete the airemissions permitting for B910.
- B) Rev. 0 incorporated calibration recording requirements (Section 6.12) as requested by the CDH.

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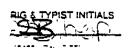
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R. J. Schassburger July 15, 1993 93-RF-8585 Page 2

If you have any questions, please contact D. A. Ringle at 966-8603.

R. L. Benedetti

Associate General Manager

**Environmental Restoration Management** 

EG&G Rocky Flats, Inc.

DSB:bep

Orig. and 1 cc - R. J. Schassburger

CC:

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F. R. Lockhart - DOE, RFO

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